



CJ-2020-2664
TIMMONS

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

Jose Mejia Lopez,)
Plaintiff,)
vs.)
R&R Express, Inc; Edward Daniel Davis;)
and American Hallmark Insurance Company)
Defendant.)

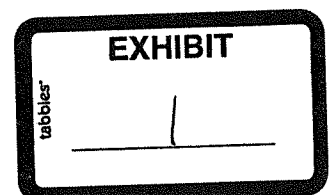
JUN 11 2020
RICK WARREN
COURT CLERK
Case No. 102

CJ-2020-2664

PETITION

COMES NOW the plaintiff, Jose Mejia Lopez and for his cause of action against the defendants Edward Daniel Davis, R&R Express, Inc, and American Hallmark insurance company, and states and alleges:

1. That on about the 3rd day of January 2020, the plaintiff was occupying a vehicle that was negligently struck by a vehicle being driven by the defendant Edward Daniel Davis.
2. The accident was caused by the failure of the defendant, Edward Daniel Davis to use ordinary care, and/or the requisite standard of care, including but not limited to, following too closely and being inattentive in driving.
3. As a result of said motor vehicle accident and negligence of the defendant, the plaintiff has suffered actual damages, including but not limited to, past and future pain and suffering, medical treatment and expenses, and other items of actual damages exceeding \$76,001.



4. That at the time of said collision, it is believed that the defendant Edward Daniel Davis was operating under the scope of agency, employment, or authority of R&R Express, Inc and/or said defendant negligently entrusted or supervised Edward Daniel Davis.
5. That the vehicle being driven by the defendant Edward Daniel Davis may have been of the Class Motor Coverage permitting a direct action against the carrier American Hallmark Insurance Company.

WHEREFORE, the plaintiff Jose Mejia Lopez respectfully requests joint and several judgments against the above named defendants Edward Daniel Davis, R&R Express, Inc., and American Hallmark Insurance Company for actual damages in excess of \$76001.00, cost, and any other item of damages this Court May deem proper.



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Attorney's Lien Claimed